

RECEIPT NUMBER: DET079676

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May 18, 2015

Hand Delivery

Clerk of Court

The United States District Court

For The Eastern District of Michigan

Southern Division

U.S. Courthouse

231 W. Lafayette Blvd.

Detroit, Michigan 48226

FILED
2015 MAY 18 AM 11:17
U.S. DIST. COURT
EAST DIST. MICH.
DETROIT

Case No. 2:10-cv-14360-DPH- MKM

The Shane Group, Inc. etc. al

Response to Order Denying Application to

Proceed With Appeal Without Prepaying Fees or Costs, Request to Proceed

Requested

Plaintiffs,

v. Blue Cross Blue Shield of Michigan

Defendant

Christopher Andrews,

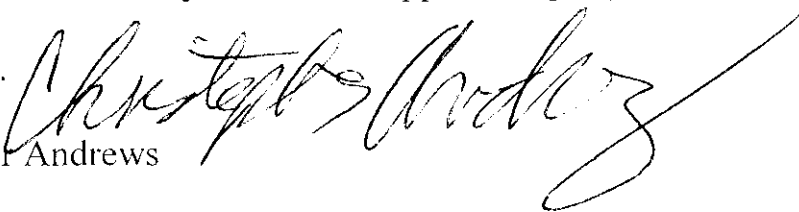
Objector/Appellant, Pro se, non attorney

Objector was unaware of the need to set forth the issues he intends to present on appeal based on the district court's ruling of May 13, 2015 docket # 223 because the very same issues and claims made by the objector in the submissions are still valid today. The objector requests that the district court review the attached civil appeal statement which will be filed today via next day air to the appeals court along with some other documents that repeats the missing requested information. The objector requests to be able to proceed without prepaying costs and/or fees based on the statement attached and claims the right to appeal of legal errors made that has harmed the class and the objector.

If the court does not allow the objector to proceed without prepaying fees the attached money order made out to the US District Court in the amount of \$505.00 has been raised in order to proceed. In the event the court allows the objector to move forward without prepayment, the request is made to return the raised funds to the objector for delivery back to the applicable party who's funds they belong.

Thank you.

Christopher Andrews

A handwritten signature in black ink, appearing to read 'Christopher Andrews', written over the printed name.

PO Box 530394

Livonia, MI 48153

248-635-3810

UNITED STATES COURT OF APPEALS
FOR THE SIXTH CIRCUIT
CIVIL APPEAL STATEMENT OF PARTIES AND ISSUES

Case No: 15-1544

Case Name: The Shane Group, Inc., et al., v. Blue Cross Blue Shield of Michigan, et al.,

Is this case a cross appeal? ☒ Yes ☐ No

Has this case or a related one been before this court previously? ☐ Yes ☒ No

If yes, state:

Case Name: _____ Citation: _____

Was that case mediated through the court's program? ☐ Yes ☒ No

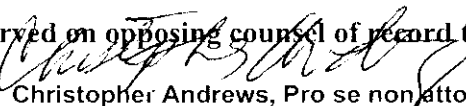
Please Identify the Parties Against Whom this Appeal is Being Taken and the Specific Issues You Propose to Raise:

ALL parties in the litigation. Specific issues already in the record as described below such as but not limited to:

- A. Objection to the adequacy, accuracy of the Notice Plan, Claims Process, Forms and Benefits.
- B. Objection to the adequacy, accuracy of Release, Stipulation of Settlement and named plaintiffs of the class.
- C. Objection to the adequacy of Class Certification approval, Allocation Plan, Cy pres concept, fund and amount
- D. Objection to grossly excessive, egregious and outrageous Attorneys' Fees, Expenses and Incentive Awards
- E. Objection to the Final Judgment, Order Approving Settlement, Opinion and Order, all are defective.
- F. Objection to district court's obvious biased for the defendant and against the objector, class, and it's claims.
- G. Objection to plaintiff counsels false sworn lodestar. The hourly rates are inflated by 34% or \$5 million and the hours inflated up to 34% or \$5 million. Unseen expenses of \$3.5 million were not reviewed and appear excessive.
- H. Objection to the district court awarding \$1.6+ million in fees, expenses, service awards to multiple parties that have illegitimate named plaintiffs. One firm had it's entire case dismissed three years before approval by the very same district court yet that firm, a non-party, was still awarded \$700,000.00 in fees and expenses.
- I. Objection to numerous firms engaging in \$1.4 million billing inflation scheme by "ghost promoting" attorneys from associate to partner, and contract attorney status, defrauding the class. One firm billed a ten year full time technology manager, apparent non lawyer, as an "Of Counsel" for \$200,000.00, yet the entire fee approved. The percentage of fund award calculation of \$10 million is materially erroneous & excessive per items D, G-I above.
- K. Objection to district court failure to impose sanctions despite all the evidence of counsels knowingly and willingly engaging in a systematic and systemic pattern of fraudulent behavior against the class's interests.
- J. The legal work that was performed, including fees, was excessive, duplicative, unnecessary, unproductive, inefficient, redundant, and wrong which materially cheats the class and violated Rules of Professional Conduct. The issues above fail to meet numerous sections under Rule 23, counsel violated it's fiduciary obligations to us.

This is to certify that a copy of this statement was served on opposing counsel of record this 18th day of

May, 2015.


Christopher Andrews, Pro se non attorney

Name of Counsel for Appellant

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

THE SHANE GROUP, INC., et al.,

Plaintiffs,

v.

BLUE CROSS BLUE SHIELD OF
MICHIGAN,

Defendant.

Case No. 10-CV-14360
(Class Action Matter)
HON. DENISE PAGE HOOD

**ORDER DENYING APPLICATION TO PROCEED
WITHOUT PREPAYING FEES OR COSTS ON APPEAL**

This matter comes before the Court on Objector Christopher Andrews' Application to Proceed Without Prepaying Fees or Costs on Appeal. (Doc. No. 213) On March 31, 2015, the Court entered an Opinion and Order regarding the Fairness Hearing, an Order Approving Settlement and a Final Judgment in this action. (Doc. Nos. 213, 214, 215) Objector Andrews, proceeding *pro se*, filed a Notice of Appeal on April 28, 2015. (Doc. No. 216)

Pursuant to 24(a)(1) of the Rules of Appellate Procedure, a party seeking to appeal *in forma pauperis* must file a motion in the district court and must file an affidavit that:

(A) shows in the detail prescribed by Form 4 of the Appendix of Forms the party's inability to pay or to give security for fees and costs; (B) claims an entitlement to redress; and (C) states the issues that the party intends to present on appeal.

Fed.R.App.P. 24(a)(1); *Callihan v. Schneider*, 178 F.3d 800, 803 (6th Cir. 1999). After the required information has been filed under Rule 24(a)(1), the district court must ascertain both the individual's pauper status and the merits of the appeal. *Callihan*, 178 F.3d at 803.

Objector Andrews did not file the form set forth in Form 4 as required by the Court of Appeals. Objector Andrews did submit an "Application to Proceed in the District Court," which is not as detailed as Form 4. Based on the Application submitted by Objector Andrews, it appears Objector Andrews has shown pauper status.

As required by the Rule 24(a), the Court must also ascertain the merits of the appeal. Objector Andrews did not set forth the issues he intends to present on appeal. However, based on this Court's Opinion and Order regarding the Fairness Hearing, the Court finds Objector Andrews has not shown that his appeal has any merit. (Order, Doc. No. 213, Pg ID 6980-81, 6985-7002, 7013-15)

Accordingly,

IT IS ORDERED that Objector Christopher Andrews' Application to Proceed

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

THE SHANE GROUP, INC., et al.,

Plaintiffs,

v.

BLUE CROSS BLUE SHIELD OF
MICHIGAN,

Defendant.

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Christopher Andrews

May 18, 2015. I hereby certify that on this day I sent the foregoing to the Clerk of the Court, U.S. Court of Appeals for the Sixth Circuit and served true and correct copies upon class counsel via email (per their permission) at the email addresses below. United States Court of Appeals

For the Sixth Circuit, Potter Stewart

U.S. Courthouse

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